will provide statistics documenting its experiences with Ameritech service. Other telecommunications carriers can easily compare these statistics with public regulatory reports that Ameritech files with regard to its existing services. For instance, by comparing the actual installation intervals that the other carrier is experiencing on unbundled loops with the intervals reported on Ameritech's Open Network Architecture ("ONA") report filed with the FCC, the other carrier could easily assess the relative parity of treatment. If it is not satisfied, the other carrier can escalate the issue within Ameritech for resolution or file a complaint with the FCC or this Commission.

46. Ameritech only charges other telecommunications carriers for maintenance calls to repair unbundled network elements in certain limited circumstances. If the other carrier reports customer trouble to Ameritech and Ameritech dispatches a technician, when the trouble was not caused by Ameritech's facilities or equipment, the other carrier is obligated to pay Ameritech a trip charge for the trouble dispatch and time charges per quarter hour (with a quarter hour minimum charge), based on the current time charges.

47. Ameritech Communications, Inc. will be treated in the same fashion as other telecommunications carriers with regard to installation, maintenance and repair.

A. CHECKLIST ITEM (iv): LOCAL LOOPS

48. A local loop is defined under Section 51.319 of the FCC's rules as "a transmission facility between a distribution frame (or its equivalent) in an incumbent LEC central office and an end user customer premises." Ameritech offers a wide variety of local loop types, as outlined in the AT&T Agreement (Schedule 9.2.1), and as more fully described in Mr. Dunny's affidavit. In addition, Ameritech will provide additional or modified local loop types, as well as subloop elements, through the Bona Fide Request ("BFR") process Mr. Dunny describes.

49. Ameritech has implemented procedures that enable it to provide unbundled loop transmission throughout its service territory. These procedures include the necessary ordering, installation, testing, billing, maintenance, and repair procedures for its unbundled loops.

50. Ameritech provides, on an electronic basis, the pre-ordering functions applicable to unbundled loops, i.e., customer service records, address validation and due date selection. Electronic interfaces are also provided for unbundled loop order entry, provisioning status, maintenance and repair, and billing. The actual provisioning of unbundled loops, however, always requires manual intervention.

51. The provision of unbundled loops involves special steps because more than one carrier will be involved in the establishment of basic local exchange service to an end user customer. Coordination and joint testing usually is required between carriers to help ensure that (i) the end user customer receives seamless service and does not experience lapses of service; (ii) the components of service properly function together; and (iii) the providers can isolate and correct service problems. Requesting telecommunications carriers can order unbundled loop transmission through the AIIS service center.

52. Ameritech uses the standard electronic data interchange ("EDI") format to provide mediated electronic access to interactive functions of pre-ordering information required for unbundled loops. EDI is the format currently used throughout Ameritech's operations for ordering resold services. File transfer is used in those cases where the underlying data are relatively static, e.g., the Street Address Guide (SAG).

53. AIIS has adopted the industry standard Access Service Request ("ASR") format for unbundled loop transmission orders. The ASR is the nationally defined format for exchange access orders developed by the Ordering and Billing Forum ("OBF"), an industry forum sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS"). The OBF includes representatives from all affected segments of the telecommunications industry, including interexchange carriers, competitive access providers and LECs. In the five-state region, AIIS already has processed orders for and provisioned over 27,000 loops for other carriers through the ASR interface.

54. The ASR format offers to requesting carriers the option of electronically transmitting unbundled loop transmission service orders through an application-to-application interface

(EXACT) or through a personal computer interface (PC-EXACT). These interfaces provide for the electronic exchange of documentation and data to facilitate the preparation of an order, including the requested due date, order confirmation and other technical details.

55. In addition to the electronic ordering interfaces, a telecommunications carrier has the option of submitting orders for unbundled loop transmission by mail or facsimile. If the carrier selects one of these alternatives, an AIIS service center works with the carrier to develop timely and efficient methods for manually exchanging order information.

56. A telecommunications carrier may request new unbundled loops, or may request the conversion of an existing, "bundled" exchange service. The latter case requires that the carrier provide information to AIIS regarding the existing, "bundled" services that are to be disconnected, so that the unbundled loops can be disaggregated from the end user's bundled local exchange service. Once the service request has been received and edited, the order is processed and forwarded to Ameritech's provisioning systems.

57. Unbundled loop requests are automatically routed to the facility assignment systems, which will select appropriate loop facilities to match the unbundling service request. The service order is also routed to a special services center to complete the unbundled loop design, and to inventory the entire circuit from the network interface (at the end user's premises) to the final connection to the other carrier's collocated equipment in the Ameritech central office. This center will either mechanically or manually assign the carrier's designated tie cable as well as any other tie cables required within the central office. These tie cables connect the unbundled loop, which terminates on Ameritech's main distribution frame ("MDF"), to the requesting carrier at its established point of collocation in the central office.

58. After the facility assignment and design for the unbundled loop are completed, the unbundling service order is distributed to the required work groups. NECC personnel then contact the carrier to establish a coordinated cut-over schedule. When both the NECC and the other carrier are satisfied that they have successfully installed and tested the services, the NECC completes the order for bill processing.

59. Ameritech's Carrier Access Billing System ("CABS") has been modified to accurately bill for unbundled loops.

60. To provide more detail, I will discuss the manual operations required for a "new" loop, conversion of existing "bundled" service and a partial conversion of existing service. I will then discuss Ameritech's capacity to provide manual processes.

61. "New" Loop: The most basic case of provisioning an unbundled loop involves no coordination and no conversion of a pre-existing customer. In this case, the carrier simply orders a "new" unbundled loop to a customer location (e.g., to serve a new customer with no pre-existing local exchange service). This type of order requires manual activity in four areas.

62. First, loop assignment manual intervention is required approximately 39% of the time, based on Ameritech's experience. A portion of this activity is caused by historical internal records inaccuracies that prevent loop assignments from flowing mechanically. In addition, manual processing is required whenever the area surrounding the desired customer location is served predominantly by Integrated Digital Loop Carrier (IDLC) or Remote Switch Units (RSUs) deployed as loop concentrators. Manual processing may also be required when the carrier orders a loop requiring special treatment or conditioning (e.g., ISDN, or DS-1).

63. Second, tie pair assignment manual intervention is required approximately 15% of the time due to the need to create multiple cross connections on different frames within certain offices and the need to match these assignments with the carrier's designated frame appearance (called a "Connecting Facility Assignment" or "CFA"). The designation of the CFA is under the carrier's control, and it is the carrier's responsibility to designate the proper CFA for each service. Manual processing is required to correct any discrepancies (e.g., those cases where the carrier designates a CFA that is already assigned).

64. Third, central office main frame manual activity is required on 100% of unbundled loop orders. Loops terminate on Ameritech's MDF. A loop is not considered unbundled until it has been cross connected to a carrier's designated frame location. This work is 100% manual as it

requires the running of "jumper" wires on the main frame and in many cases on intermediate distributing frames.

65. Fourth, depending on the type of loop ordered, geographic location, type of outside plant facilities, quantities of loops ordered and other factors, it may be necessary to dispatch an outside technician to provide the unbundled loop. The same factors requiring outside dispatch for bundled exchange service apply to unbundled loops. As with bundled services, the processes for unbundling are structured to minimize the need for outside dispatches. Outside dispatches always require manual activity. To date, Ameritech's experience has been that approximately 25% of new unbundled loops require outside dispatch.

66. Conversion of Existing Service: The second scenario involves the transfer of an existing bundled exchange service to a carrier using an unbundled loop. In this case, the disconnection of the customer's local exchange service must be coordinated with the establishment of the unbundled loop that is cross connected to the carrier. These functions are coordinated and sequenced so that any service disruption to the end user customer is minimized.

67. Unbundled loop orders requiring coordination and re-use of loop facilities require a higher degree of manual activity.

68. Until recently, loop assignment manual intervention was required 100% of the time. Ameritech has developed a process to eliminate manual processing of orders, in most instances, for single line customers converting to another carrier. However, orders involving multiple lines require manual processing to ensure that each bundled service line is re-used exactly as requested by the carrier. The manual processing also prevents re-using facilities that may be unsuitable for the unbundled request (e.g., IDLC).

69. Tie Pair assignment for existing service conversion involves the same processes as I described previously with respect to "new" loops.

70. Where requested, switch translations required for the deployment of interim number portability coincident with the cutover of the unbundled loop are performed on all conversions of live service. Such translations are manually entered by the Recent Change Memory and

Administration Center (RCMAC) as "pending" requests to be manually released at cutover by the NECC.

71. Central office frame manual activity for existing service conversion involves the same process as I described previously with respect to new loops.

72. Manual coordination by the NECC of cutovers with a carrier is required on 100% of unbundled loop requests involving re-use of existing facilities and conversion of live service. Technicians in the NECC are the single point of contact for the carrier and Ameritech field forces for coordinating live service conversions. These technicians are responsible for scheduling cutover activities in a manner that minimizes end user customer out of service time.

73. Outside dispatch is required on unbundled loop requests to re-use existing facilities in those cases involving IDLC or RSU devices. Outside technicians are dispatched to transfer the loop facilities to suitable spare loops where available. The requirement for outside dispatch in these situations will vary widely based on geographic area and the type of outside plant facilities.

74. Partial Conversion: The third scenario is the "multi-vendor" request. This is the most complex scenario and involves the most manual intervention. These types of requests are encountered when the end user customer chooses to transfer only a portion of their working exchange service to a carrier, leaving a portion to be served by Ameritech. This scenario entails a high degree of coordination not only with the carrier, but also with the end user customer to ensure the remaining services are configured according to the customer's requirements.

75. Ameritech's Capacity for Manual Processes: By their nature, the manual processes described above require human intervention and labor. At the simplest level, increasing the volume of this manual work requires an increased number of work hours to complete all of the work. However, Ameritech's capacity to handle a given volume of manual activity is influenced by a number of factors in addition to the volume itself.

76. First, geographic location plays a role. For example, is the unbundled loop demand experienced in one or a few central offices? Or, is the demand spread across many offices? The degree to which the loop demand is concentrated in one or a few offices may allow for more

efficient work force scheduling and load distribution. However, if the offices are geographically remote or dispersed, then efficient scheduling of work forces is more difficult.

77. Second, there is the matter of central office logistics. The size and layout of the central offices may impact the degree to which a high volume of activity can be easily accommodated. In some cases, a small central office or remote location may have an MDF configuration that simply cannot support more than one or two technicians at a time. Thus, the size of the office may impose a limit on the volume of work that can be physically processed during a given timeframe.

78. Third, volumes may exceed assigned work force. Work force scheduling and assignment is based on load. If a given office has experienced a stable volume of work load over a period of time, then it is a relatively simple matter to schedule an appropriate level of work force to handle the volume. However, spikes in activity do occur and are handled by temporarily shifting workers or by increasing work hours through overtime. If volume is consistently increasing, then longer term solutions are required to increase capacity (i.e., hiring/training additional workers).

79. Finally, forecasting plays a critical role. Ameritech can only prepare for the work volumes it can reasonably expect to occur. This is done based on forecasting work volume and assigning the appropriate level of work force to meet the forecast. To the extent that the forecasts Ameritech obtains from a carrier are not accurate, then Ameritech cannot assign the appropriate level of work force to complete the required work on a timely basis. This situation is exacerbated if the carrier provides no forecast at all.

80. Ameritech's ability to increase manual capacity is determined by the time required to train employees to perform the required tasks related to unbundled loop provisioning. The figures below are approximate and assume a minimum level of proficiency:

Loop assigner - 12 weeks
Frame technician - 4 weeks
Outside technician - 12 weeks
RCMAC technician - 12 weeks
NECC technician - 12 weeks

81. Under the AT&T Agreement (Schedule 9.5), the following procedures apply for the provisioning of unbundled loops: First, the other carrier requests unbundled loops from Ameritech

by delivering to Ameritech a valid service order using the Ameritech electronic ordering system or another mutually agreed upon system. Within twenty-four (24) hours of Ameritech's receipt of a service order, Ameritech will provide the carrier the firm order commitment date by which the loop(s) covered by the service order will be installed. (AT&T Agreement, Schedule 9.5 (2.2.1)) Ameritech will provision unbundled loops in accordance with the time frames set forth in the AT&T Agreement (Schedule 9.5-2.0) or within such other intervals as agreed upon by the parties. Ameritech then will coordinate the scheduled conversion time with the other carrier at least forty-eight hours prior to the due date.

82. Not less than one hour prior to the scheduled conversion time, either party may contact the other party and request a new scheduled conversion time. If the new conversion time is within the previously established conversion window, no penalties will be assessed. If, however, the new conversion time is outside of the conversion window, penalties will be assessed to the party that requested the delay. If Ameritech requests the new conversion time, the applicable line connection charge will be waived. If the other carrier requests the new conversion time, that carrier will be assessed a double line connection charge.

83. Unless the parties otherwise agree, the time interval for disconnection of "live" telephone exchange service to the connection of an unbundled network element at the other carrier's collocation interface point will be sixty minutes or less. If a conversion interval exceeds sixty minutes and the delay is caused solely by Ameritech, Ameritech shall waive the applicable line connection charge. If the other carrier has ordered interim number portability (INP) with the installation of a loop, Ameritech will coordinate the implementation of INP with the loop conversion during the sixty-minute interval at no additional charge.

84. As described in the AT&T Agreement (Schedule 9.5-2.12), if a telecommunications carrier requests one or more unbundled loops serviced by Integrated Digital Loop Carrier ("IDLC") or Remote Switching technology deployed as a loop concentrator, Ameritech will move the requested loop to a spare, existing physical loop where available, at no additional charge to the carrier. If, however, no spare physical loop is available, Ameritech will, within forty-eight hours

of the request, notify the carrier of the lack of available facilities. The carrier may then ask Ameritech to provide the unbundled loop through the demultiplexing of the integrated digitized loop(s). Ameritech will bill the carrier for this functionality change, as permitted by the FCC's Order.

85. As described in the AT&T Agreement (Schedule 9.5-2.13), in the event a carrier orders a loop type and the distance requested on such loop exceeds the transmission characteristics as referenced below, the carrier may request a distance extension, where technically feasible, to meet the specification.

Loop Type	Technical Reference/Limitation
Electronic Key Line	2.5 miles
ISDN	Bellcore TA-NWT-000393
HDSL 2W	T1E1 Technical Report Number 28
HDSL 4W	T1E1 Technical Report Number 28
ADSL 2W	ANSI T1.413-1995 Specification

As permitted by this Commission's regulations, additional rates and charges will apply if a carrier makes such a request.

86. Specific procedures have been developed for the maintenance of unbundled loops. The NECC has established maintenance procedures that outline steps necessary to promptly isolate and resolve trouble reports. When the NECC receives a trouble report, it issues a trouble ticket via Ameritech's Work and Force Administration ("WFA") System, which facilitates the tracking and resolution of the service problem. Ameritech also provides an "electronic bonding" process so that a requesting carrier may electronically input its own trouble reports and monitor status and resolution of repair cases.

87. Next, the carrier analyzes and tests the trouble. The NECC works with Ameritech and the carrier's personnel as necessary to perform any additional testing of the loop facility. If the trouble is caused by Ameritech's facilities, the NECC will work with field personnel to promptly

resolve the problem and communicate the status and resolution of trouble to the other carrier. If the electronic bonding method is utilized, the other carrier is able to monitor the status of these repair requests electronically.

88. The provisioning intervals for unbundled loop transmission are based upon Ameritech's actual experience to date and reflect the operational differences from "bundled" service provisioning. The current average intervals, which assume that a field dispatch is not required, are as follows:

Non DS1 Unbundled Loop - Standard Customer Intervals:

Volume	Interval
1 - 24	5 business days
25 - 48	6 business days
49 - 96	7 business
97 or more	negotiated

DS1 Unbundled Loop - Standard Customer Intervals:

Volume	Interval
1 - 4	5 business days
5 or more	negotiated

89. Ameritech provides unbundled loop transmission to other telecommunications carriers on the same basis as it provides such transmission to its own affiliates or subsidiaries. All requests for unbundled loops, whether provided to other telecommunications carriers or to an Ameritech affiliate or subsidiary, are ordered through the same regional AIIS service center and the same ordering systems. These loop orders proceed through the same assignment and provisioning systems. Installation and maintenance operations also are handled by the same systems regardless of whether the service is provided to an Ameritech affiliate or another carrier.

90. Installation intervals on unbundled loops differ from the intervals experienced by Ameritech's end user customers because the provision of an unbundled loop requires several additional process steps that are not required in the provision of Basic Local Exchange service. For example, there will be a difference if another carrier requests coordination of the loop installation with other requests, such as the coordinated disconnection of related exchange services

for the same end user, or if the carrier requests the simultaneous establishment of interim number portability at the time of the unbundled loop installation.

91. When another carrier requests the full or partial disconnection of existing end user services, and the conversion of all or a portion of the end user's existing facilities to unbundled service, then manual assignment processing is required to ensure that appropriate facilities are re-used. In addition, if the conversion includes interim number portability, manual procedures are used to coordinate the unbundled loop provisioning with the translations that provide the number portability routing. These coordination functions minimize any possible disruptions that end users may experience in moving their service from Ameritech to the requesting carrier.

92. On all requests that require physical work in the field, unbundled loops and "bundled" exchange services are provided on the same intervals based on field force availability and projected workload volumes.

93. On the other hand, for new loops, a non-coordinated order for an unbundled loop is possible and may not incorporate interim number portability or the disconnection of existing, "bundled" exchange services. While the provision of a non-coordinated order involves fewer process steps than the coordinated scenario, the non-coordinated order still requires the provisioning steps I discussed earlier in my affidavit.

94. In most cases, the non-coordinated unbundled loop is provisioned in approximately the same time frame as Ameritech provides a similar, "bundled" local exchange service for which central office jumper connections are required.

95. However, due to the fact that unbundled loop provisioning is dependent on matching assignments of both Ameritech and the requesting carrier, these orders can take additional time to process, even though they are non-coordinated. In addition, all unbundled loop requests require manual work on the central office frame. In many instances, a "bundled" service can be provided without the need for manual work. However, the unbundled, non-coordinated order may often require manual work that may not be required for a "bundled" service request.

B. NETWORK INTERFACE DEVICE (NID)

96. The NID is defined in Section 51.319 of the FCC Rules "as a cross-connect device used to connect loop facilities to inside wiring." Generally, NIDs currently installed by Ameritech also provide cable pair protection and overvoltage protection by grounding the loop facilities.

97. As provided in the AT&T Agreement (Schedule 9.2.2), Ameritech offers another telecommunications carrier the ability to connect its own local loop, via that carrier's adjacent NID, to the inside wiring of the end user's premises through Ameritech's NID.

98. The "dual-chamber"-type NID devices currently deployed by Ameritech on all new residence and 1-6 line individual business locations consist of one chamber for end user or the requesting carrier's access and a second chamber for Ameritech's access. The end user access chamber typically contains RJ-11 type connectors to provide access to the inside wire. The end user access chamber also has a "punch-out" hole in the bottom to allow the requesting telecommunications carrier to extend the inside wire out of the NID housing itself.

99. As fully described in the AT&T Agreement (Schedule 9.5-3.0), another telecommunications carrier may make the connection between its loop and the customer's inside wire by installing an adjacent NID of its own, connecting their NID to the customers wire via a jumper wire to Ameritech's NID, and providing electrical grounding protection for its own loop facilities. The other carrier may request Ameritech to re-arrange terminal enclosures or inside wire on a time and materials cost basis.

100. Ameritech offers access to NIDs on a non-discriminatory basis to requesting telecommunications carriers. Any carrier may gain access to an end user's inside wire through Ameritech's NID on a "first-come, first-served" basis. Because the NID device itself can connect only one loop facility to one inside wire pair at a time, it is not feasible to connect one inside wire pair simultaneously to multiple loop facilities. Ameritech therefore is not in a position to discriminate between a requesting carrier desiring to connect its own connection to the inside wire, in part, because the work required to establish these connections can be performed by the

requesting carrier without intervention by Ameritech. I also should note that the inside wire connected to Ameritech's NID is under the end user's control.

C. CHECKLIST ITEM (vi): UNBUNDLED SWITCHING

1. LOCAL SWITCHING

101. Ameritech's unbundled local switching offering provides unbundled access to all switching capabilities and features associated with an Ameritech local switch, separate from the local loop and transport or other services. Mr. Dunny explains the unbundled local switching product in his affidavit.

102. As described in the AT&T Agreement (Section 9.5-4.2), unbundled local switching (ULS) can be ordered using electronic interfaces. The ULS trunk side port is ordered using the ASR format, which I described earlier with respect to unbundled loop transmission. All other unbundled local switching ports are ordered via an electronic data interchange ("EDI") format currently used throughout Ameritech for ordering resold exchange services. Both pre-ordering and ordering functions are supported through this interface.

103. Once established, another telecommunications carrier may activate and de-activate features on a line-by-line basis over the EDI interface. Ameritech will transfer a customer's local service to unbundled local switching within a time period no greater than the interval in which it currently is using to transfer its end users between interexchange carriers, as long as the conversion only involves software changes.

104. As described in the AT&T Agreement (Section 9.9, Schedule 10.13, 10.13.3), requests for maintenance or repair of unbundled local switching may be initiated using the industry standard electronic bonding interface (EBI). The EBI electronically provides confirmation of receipt, status and notification that the case has been resolved.

105. The billing capabilities associated with unbundled local switching include both daily usage feeds and monthly summary bills. These feeds and summaries provide, on an ongoing basis, all information regarding the local switching element that the requesting telecommunications

carrier needs to bill its end user. Both daily feeds and monthly summaries are available in industry standard formats.

106. Ameritech provides unbundled local switching through the same facilities, interfaces, specifications, procedures and practices that Ameritech uses to provide comparable local switching to its end user customers, to itself and to its affiliates. In addition, Ameritech provides technical parity for requesting carriers, including parity of installation and repair.

2. TANDEM SWITCHING

107. Tandem switching capability is similar to local switching capability, except that it is provided via Ameritech's tandem switches. A tandem switch is a switch used to provide a connection between two other switches, and thus provides trunk-to-trunk connectivity. A more detailed description of Ameritech's tandem switching proposal, contained in the AT&T Agreement (Schedule 9.5-4.3), is provided in Mr. Dunny's affidavit.

108. The process for providing tandem switching capability from an operational perspective is set forth in the AT&T Agreement (Schedule 9.5-4.3). As with unbundled local (end office) switching, another carrier may order unbundled tandem switching using electronic interfaces. All trunk side ports will be ordered using the ASR format, which I described earlier in my affidavit. In addition, like local switching capabilities, requests for maintenance or repair of tandem switching capabilities may be initiated through the EBI.

109. The same nondiscrimination safeguards for local switching which I previously described also apply to tandem switching.

D. INTEROFFICE TRANSMISSION FACILITIES

110. Interoffice transmission facilities are defined in Section 51.319(d) of the FCC's rules "as incumbent LEC transmission facilities dedicated to a particular customer or carrier, or shared by more than one customer or carrier, that provide telecommunications between wire centers owned by incumbent LECs or requesting telecommunications carriers, or between switches owned by incumbent LECs or requesting telecommunications carriers." As described in the AT&T

Agreement (Schedule 9.5-5.0), Ameritech offers a variety of local transport services from the trunk side of its switches unbundled from switching and other services.

111. Ameritech has implemented procedures to provide unbundled local transport. Ameritech has prepared and implemented ordering, installation, testing, billing, maintenance, and repair procedures for its unbundled local transport. These procedures address the particular operational needs involved in installing, provisioning and maintaining these services.

112. Unbundled local transport utilizes standard ordering procedures that a requesting carrier follows when ordering special access high capacity transport. Coordination and joint testing may be required between Ameritech and the requesting telecommunications carrier to help ensure (i) that the transport, when combined with other Ameritech or the other carrier's network elements, provides seamless service; (ii) that components of service provided by the other carrier and the unbundled transport properly function together; and (iii) that service problems are isolated and corrected. A telecommunications carrier may order unbundled local transport through the AIIS service center for unbundled products.

113. Ameritech has adopted the industry standard ASR format, which I described earlier in my affidavit with respect to unbundled loop transmission, for orders for unbundled local transport. In addition to electronic interfaces, requesting carriers have the option of submitting orders for local transport by mail or facsimile transmission. AIIS will work with requesting carriers selecting these manual methods to develop timely and efficient methods for exchanging order and billing information.

114. In the area of provisioning, Ameritech uses its existing provisioning procedures, systems, and personnel to provision unbundled local transport. Under these provisioning procedures, the requesting carrier's order is processed through the AIIS Service Center and then forwarded through the Ameritech exchange access provisioning system. When both Ameritech and the other carrier are satisfied that they have successfully installed and tested the service(s), the order is completed for bill processing. Ameritech's CABS system is capable of accurately billing for unbundled local transport.

115. If the carrier wants to disconnect current special access services from Ameritech, the order will include a disconnect request. The AIIS service center then edits and processes the request before forwarding requests for unbundled local transport through the Ameritech standard exchange access provisioning system.

116. Orders for unbundled local transport require standard special access system processing, including the creation of a Design Layout Record (DLR). The special access system processing is commenced by mechanically forwarding unbundled local transport requests to Ameritech's special access services facilities assignment system and to its special access design system for processing.

117. The AIIS service center provides the A and Z locations, the type of system, the line code and the frame form information to the Inter-office Facilities Circuit Provisioning Center (IFCPC). The AIIS service center receives the required information back from the IFCPC. The service representative creates the ASR/EXACT service order that is distributed to the Hi Cap Circuit Provisioning Center ("CPC").

118. After the facility assignment and design for unbundled local transport is created, the unbundled transport service order is distributed to the Ameritech field work groups and to the carrier for processing. The Ameritech HiCap Center contacts the requesting carrier to establish coordinated intervals and schedules. The Ameritech HiCap Center coordinates the work activities within the various Ameritech field work groups. When both the Ameritech HiCap Center and the other carrier are satisfied that they have successfully installed and tested the service(s), Ameritech's HiCap Center completes the order for bill processing.

119. Specific maintenance procedures have been developed for the repair of unbundled local transport. The NECC maintenance procedures outline the steps necessary to isolate and resolve trouble reports via Ameritech's HiCap Center, which is the administrative center that handles high capacity customer circuits.

120. Ameritech also dispatches personnel to perform additional testing on central office equipment or at the point of interface to the requesting carrier. The Work and Force Administration

("WFA") System queues the HiCap Center to dispatch service technicians to resolve the service problem. Since the queue is computer-generated, service technicians are dispatched on a "first-come, first-served" basis, and therefore resolve trouble reports for unbundled local transport service in a non-discriminatory manner. Ameritech promptly advises the other carrier if it discovers that the problem is with that carrier's facilities or equipment, and when problems are resolved.

121. Ameritech provides interoffice transmission facilities in a nondiscriminatory manner. The provisioning and maintenance intervals for unbundled local transport are based on Ameritech's actual experience to date with respect to comparable private line and special access services. These intervals are dependent on the availability of facilities and personnel at the requested location.

DS1 Unbundled Local Transport	
On network building	5 days
Facilities available	7 days
Facilities or force not available	Negotiated
DS3 Unbundled Local Transport	Negotiated
OC-N Unbundled Local Transport	Negotiated

These intervals were specifically approved by the Commission in the AT&T arbitrated agreement (Schedule 9.10).

E. CHECKLIST ITEMS (vii)(II), (III): OPERATOR SERVICES AND DIRECTORY ASSISTANCE

122. Ameritech operator services and directory assistance offerings to resellers and requesting carriers, both bundled and unbundled, are described by Mr. Dunny. From an operational perspective, bundled operator services and directory assistance is provided to resellers and requesting carriers on the same basis as Ameritech's retail customers. The only exception is when the reseller or requesting carrier wants the operator services or directory assistance rebranded or unbranded, which is described by Mr. Dunny.

123. Where Ameritech is providing unbundled operator services or directory assistance, it provides access to the entire service, including any adjunct features necessary to allow competing providers full use of the service. 47 C.F.R. 51.217 (c)(3)(iv) Ameritech will supply requesting carriers with call detail information, where technically feasible, so they can rate and bill calls placed by their end users. This information excludes rating and invoicing of end user calls unless negotiated on an individual case basis.

124. Ameritech bills the requesting carriers for operator calls handled on their behalf, where technically feasible, regardless of whether or how the carrier bills their end user (i.e., 0 - calls originating from residence premises). If the requesting carrier operator services traffic is received by Ameritech's office through separate direct trunks, the Operator Services Platform records each call. These records are downloaded to Ameritech's Billing System which bills the requesting carrier. This process is completely mechanized. Ameritech bills the requesting carriers for operator services calls via the Operator Services Call Analysis System ("OSCAS") report. OSCAS records are downloaded to Ameritech's Service Billing System for billing to the requesting carrier.

125. Ameritech bills requesting carriers for directory assistance calls handled on their behalf, where technically feasible, regardless of whether or how the carrier bills their end user (i.e., calls originating from residence premises). If the requesting carrier's directory assistance traffic is received by the Ameritech office through separate direct trunks, the Operator Services Platform records each call. These records are downloaded to Ameritech's Billing System which bills the requesting carrier. This process is completely mechanized. If the requesting carriers send their traffic through a tandem, directory assistance volumes are self-reported by the requesting carrier to the Ameritech's Billing organization, which in turn bills the requesting carrier. These volumes are received from the carriers via facsimile or mail.

126. Each requesting carrier is assigned a company code that is used within OSCAS, based on its assigned central office code ("NPA/NXX") information. OSCAS utilizes operator

services billing records to produce monthly summaries of call occurrences based on these company codes.

127. Ameritech also has a specific BFR process by which a requesting carrier can obtain access to additional, unbundled network elements which the Company does not already make generally available. Mr. Dunny explains the BFR process in his affidavit.

F. COMBINATION OF UNBUNDLED NETWORK ELEMENTS

128. Ameritech's provision of combined network elements is addressed in the AT&T Agreement (Section 9.3 & Schedule 9.3). Upon request, Ameritech will perform the functions necessary to combine separate network elements in any requested manner to perform as a single element, even if those elements are not ordinarily combined in Ameritech's network, provided that such combination is (1) technically feasible; and (2) would not impair the ability of other carriers to obtain access to unbundled network elements or to interconnect with Ameritech's network. Requests by other carriers for Ameritech to provide a combination of unbundled network elements will generally be made using the BFR process detailed in the AT&T Agreement (Section 2.2 & Schedule 2.2).

129. Ameritech generally assumes that it is technically feasible to combine network elements in the same manner that Ameritech configures in its network today. Other configurations of network elements, however, must be reviewed for technical feasibility, their compliance with the above criteria, and their ability to function as an integrated element. This review is undertaken pursuant to the BFR process.

130. Ameritech will combine network elements that are ordinarily combined within its network in the same manner that they are typically combined today. Where Ameritech combines network elements it will, where technically feasible, provide the other carrier's requested configuration so that the combination functions as a single, integrated element.

131. In cases where Ameritech connects its network elements with those of the requesting carrier, it provides its elements in a way that enables the configuration to perform as a single, combined element. However, Ameritech has no control over or detailed knowledge of

other carriers' facilities and network elements. As such, in cases where the elements provided by another carrier are interpositioned between network elements provided by Ameritech, Ameritech will provide its contiguous elements so they operate as an integrated service. Ameritech also provides standard industry interfaces to the requesting carrier so that it can provide facilities that will function effectively with Ameritech's network elements. Ameritech will cooperate with other carriers to jointly resolve interoperability issues.

IV. RESALE

132. Services made available to requesting telecommunications carriers for resale will be equal in quality to services provided by Ameritech to itself or to any subsidiary, affiliate, or any other party to which Ameritech directly provides the service, including Ameritech's retail customers. Ameritech will provide the services with the same timeliness that services are provisioned to Ameritech subsidiaries, affiliates, or other parties, including Ameritech's retail customers.

133. Except as otherwise provided in the AT&T Agreement, a reseller will be the primary point of contact for all of its resale customers (Section 10.13.1(a)). However, Ameritech will, on a limited basis, retain the ability to interface with a reseller's end user for interactive testing and to ensure quality of service.

134. Ameritech will refer directly to a reseller all questions regarding any reseller service or product in accordance with the procedures set forth in the operations plan between the parties. Ameritech will use its best efforts to ensure that all Ameritech representatives who receive inquiries regarding a reseller's services do not in any way disparage or discriminate against a reseller, or its products or services. Ameritech will also provide training for all its employees who may communicate, either by telephone or face-to-face, with a reseller's customers to assure that the foregoing requirements are met. Furthermore, the same quality standards that Ameritech requires of its employees when contacting an Ameritech customer (e.g., honesty, respect and courtesy) will apply when its employees have contact with a reseller's customers.

135. Ameritech provides electronic interfaces for the transferring and receiving of data necessary to perform pre-ordering, ordering, provisioning, maintenance, repair, and billing functions related to resale. Mr. Mickens' affidavit provides a detailed discussion of the Operations Support Systems functions that Ameritech will utilize in providing resale.

136. Mr. Dunny's affidavit provides a description of 911/E911, white pages, and reciprocal compensation.

V. COLLOCATION

137. A telecommunications carrier may submit requests for physical collocation at specific Central Office locations to the AIIS Service Center in Milwaukee, Wisconsin, which will direct the request to the Ameritech Network Collocation Coordinator. The ordering procedures used for collocation are similar to those used for access services. Ameritech uses the standard industry ASR format developed for collocation (Interconnection Application/Order Form). The requesting carrier submits an ASR via facsimile or U.S. mail. Ameritech then reviews the ASR for completeness, obtains from the requesting carrier any additional information that may be required, date and time-stamps the receipt of the complete ASR order, assigns an Ameritech service order number to the request, formats the order in EXACT, and transmits the completed ASR to the customer's service manager via facsimile. The Ameritech Network Collocation Coordinator will verify availability of floor space through Ameritech's Central Office Space Planning Engineers.

138. As described in the Article XII of the AT&T Agreement, upon receiving written notification of the availability of physical collocation space from Ameritech, the requesting carrier must send written verification that it still requires each collocation space requested on the carrier's application for which space is available. This written notification is the requesting carrier's firm order for service for each collocation space requested. Central Office Build Out (COBO) modifications and additions to space described in the proposal do not begin until the appropriate portion of the COBO charge has been paid. Delayed payment of the COBO charge may delay the actual service date. When Ameritech receives a firm order, it will conduct a pre-construction survey for each request to identify all modifications and work required to provide the other carrier

with the requested space. After the pre-construction survey, the requesting carrier will make itself available for a meeting with Ameritech.

139. After this meeting, the requesting carrier receives a written proposal concerning the collocation space from Ameritech. This proposal details the associated requirements and the charges required to meet the carrier's specific request and the expected service date. The requesting carrier must acknowledge acceptance of the charges in this written proposal by signing it and returning a copy to Ameritech.

140. Once the physical collocation arrangement is in place, the collocator is responsible for maintaining its own equipment.

141. If sufficient space is not available to provide physical collocation, the customer is notified and asked whether it desires to pursue a virtual collocation arrangement.

142. For virtual collocation, the Collocation Coordinator forwards the ASR to the appropriate work groups within the network organization to determine available space, verify equipment, fiber, and power needs, and arrange for a customer walk-through to ascertain final requirements and extraordinary costs.

143. The Interoffice Facility Circuit Provisioning Center ("IFCPC") planner receives an initial copy of the request and is notified by the AIIS service center to create the necessary collocation facility identification for billing purposes. The fiber assignments and due date will be provided to the planner by the Collocation Coordinator.

144. Critical dates, which typically are negotiated, and the virtual collocation facility circuit ID are provided within two weeks of the walk-through. The service representative issues the service order within two hours of receipt of such information.

145. The interconnector's fiber is inventoried in the TIRKS database using the CLLI codes for the interconnector's ACTL location and the virtual collocation code is established for the interconnector.

146. A tie cable inventory is created in TIRKS for each interconnector's location. The tie cable is used as the Connecting Facility Assignment ("CFA") on other service requests that are to

be cross-connected to an interconnector's collocated equipment. The tie cable provides the central office technician with the LGX, DSX, or MDF location needed to cross-connect the other services to the interconnector's collocation service.

147. When the service representative obtains this information, the customer is notified with respect to the equipment bay, relay rack, CFA database information, maintenance circuit ID and provisioning data.

148. Once the virtual collocation arrangement is in place, Ameritech is responsible for providing maintenance equivalent to that which Ameritech provides to itself and other customers. If Ameritech is not familiar with the collocator's type of equipment in that particular collocated office, the customer must provide Ameritech with training particular to that equipment, or "walk" Ameritech technicians through the maintenance procedures which may be required when trouble is reported. If the customer does not provide such training directly, Ameritech may contract for the training and bill the collocator on a cost basis.

149. Due to the variations in work required to provide the necessary capabilities in any particular office, installation intervals for collocation cannot be determined on an across-the-board basis, but must be negotiated.

150. The process for reservation of physical collocation space is described in the AT&T Agreement (Section 12.9).

151. Ameritech allows telecommunications carriers to collocate, in the case of physical collocation, or to lease to Ameritech for $1.00, in case of virtual collocation, Network Equipment Building Standards (NEBS) approved transmission equipment necessary for them to interconnect with Ameritech or to access unbundled network elements.

152. Ameritech has substantial experience providing collocation space to other carriers. In 1995 and 1996, Ameritech has processed over 400 collocation orders for requests throughout Ameritech's five state region. Ameritech has met the jointly negotiated service dates for these services. Ameritech has also added Ameritech Central Office Interconnection (ACOI) to its service offering in 1996 to comply with the FCC Order and Rules. Ameritech has received over 30 orders

for the additional service offering (ACOI) and is working these requests in the same timely manner in which it has provided Ameritech Virtual Optical Interconnection Service (AVOIS) in the past. Orders for AVOIS have increased over 170% in 1996 from 1995, and Ameritech has not had a single customer escalation due to installation intervals.

VI. CHECKLIST ITEM (xi): INTERIM NUMBER PORTABILITY

153. Since interim number portability will only be provided as a transitional service until long-term database number portability is deployed, it is important that any interim method of number portability (i) be technically feasible, (ii) be available now, (iii) not result in significant additional costs, and (iv) port numbers with a minimum of loss of functionality. As the FCC found in its Telephone Number Portability First Order, CC Docket 95-116, July 2, 1996, ¶110. RCF and DID meet this criteria, and may be deployed to satisfy a LEC's duty to offer interim number portability. Accordingly, in the AT&T Agreement (Sections 13.2, 13.3, 13.4, and 13.5), Ameritech offers RCF ("SPNP - Remote") and DID ("SPNP-Direct"), as well as LERG reassignment (also called NXX Migration) as interim number portability options. Ameritech's offering of these three INP options has been approved by the Commission.

154. SPNP-Remote is provided using the same type of central office feature used to provide Remote Call Forwarding service. To provide number portability, the end user's previous telephone exchange service is discontinued, and the telephone number associated with that service is reused as part of the SPNP-Remote service. The telecommunications carrier to whom the number is to be ported assigns one of its own telephone numbers to be associated with the exchange services it provides the end user. If a call is directed to the number formerly associated with the service Ameritech provided the end user, SPNP-Remote is programmed to originate a new call to the number assigned by the new telecommunications carrier. The call is then routed over the end office integration trunks to that carrier.

155. RCF can effectively serve customers who receive many simultaneous calls to one number by adding additional call paths to the ported telephone number. This additional call path feature is available today with SPNP-Remote.

156. Ameritech also offers SPNP-Direct (sometimes referred to as flexible DID-type service). SPNP-Direct is provided by using the same features that are used today to provide DID PBX trunks. In order to use SPNP-Direct, the requesting carrier must first establish a direct trunk group from the Ameritech end office serving the end user customer to the requesting carrier's switch. Once the trunk group is in place, the end user's service can be discontinued, and the number formerly associated with that exchange service can be added to the numbers associated with the requesting carrier's trunk group. Any call directed to the number formerly associated with Ameritech's service will be completed to the requesting carrier's switch via the DID-like trunk group. Prior to connecting the call, Ameritech's switch sends the actual number dialed to the telecommunications carrier's switch so that the telecommunications carrier can route it to the appropriate end user's exchange service.

157. Ameritech today offers SS7 signaling with SPNP-Remote and has developed, market-trialed, and added SS7 signaling on trunks for Brooks Fiber which normally use MF signaling for SPNP-Direct (flexible DID).

158. SPNP-Remote and SPNP-Direct are ordered through the AIIS service center. All status and inquiries related to the service provisioning and maintenance are handled by the NECC. Ameritech offers the ordering of SPNP-Remote and SPNP-Direct via fax or an electronic data interchange (EDI) format. The EDI format is currently used throughout Ameritech for the ordering of resold exchange services. Both pre-ordering and ordering functions are supported through the use of this interface. Requests for maintenance or repair of SPNP-Remote and SPNP-Direct may be initiated using the industry standard "electronic bonding" interface (EBI). The EBI electronically provides confirmation of receipt, status, and notification that the case has been resolved.

159. The intervals for provisioning numbers under transitional number portability are as follows: